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September 16, 2010

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: TV White Spaces  
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

My company, First Step Internet of Moscow, Idaho, provides fixed wireless broadband service throughout rural northern Idaho and eastern Washington; you can see a coverage map of the territories we cover at <http://www.firststepwireless.com/>. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that have few broadband choices otherwise available to them. We built our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, many more consumers in the greater inland northwest area can now get broadband service: we ourselves are closing in on 4,000 wireless broadband customers, many of whom don't have another terrestrial broadband option.

We here at First Step are very interested in utilizing television white spaces so that we can both expand and improve our service offerings. As demand increases, both in terms of new customers needing service as well as the throughput requirements of existing customers, more spectrum is needed so that we and other entities like us can scale up our networks to meet those real-world demands. We are committed to deploying as soon as equipment for point-to-multipoint service is commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First and foremost, we believe that it is of extreme importance that the FCC release as much spectrum as possible to the unlicensed markets so that deployment and adoption of broadband services in rural areas such as ours can continue unabated. The television white space is an excellent example of spectrum that would be useful in this way.

Second, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying

and not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Third, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

Fourth, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

We thank you for your time and consideration of these matters, and with your help, we look forward to being able to continue to extend the reach of broadband in rural America.

Sincerely,

Nathan Anderson  
Network Engineer  
First Step Internet, LLC